

From: Deborah Gordon <dgordon@deborahgordonlaw.com>
Sent: Monday, July 28, 2025 10:05 AM
To: Thomas Davis; Elizabeth Hardy
Subject: FW: Deficiency Letter re: McKenna v. Riley et al subpoena

EXHIBIT 8

External (dgordon@deborahgordonlaw.com)



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From: Amanda Fox <amanda@foxmckenna.com>
Sent: Monday, July 28, 2025 10:01 AM
To: Morry Hutton <mhutton@deborahgordonlaw.com>
Cc: Deborah Gordon <dgordon@deborahgordonlaw.com>; Dora Koski <dkoski@deborahgordonlaw.com>; Teresa D'Costa <teresa@deborahgordonlaw.com>
Subject: Re: Deficiency Letter re: McKenna v. Riley et al subpoena

Dear Ms. Gordon,

I am following up regarding the third-party subpoena and your demand that I produce additional documents by last Friday.

As you know, Plaintiff addressed this issue in her status report filed last Friday, seeking clarification from the Court regarding whether she is required to participate in discovery-related disputes during the 60-day stay of her own discovery obligations. That request directly impacts the subpoenas served on me, given the significant overlap of attorney-client privilege, work product, and joint communications between Plaintiff and myself.

I have already produced limited non-privileged documents, including administrative materials. However, I cannot produce further materials—including law firm communications or agreements—without clear guidance from the Court, as doing so risks inadvertent waiver of privilege that is jointly held by Plaintiff.

Absent further direction from the Court, I will not produce additional documents or engage in meet-and-confer negotiations over privilege issues. If the Court does not address this in response to Plaintiff's status report, I intend to file a motion for protective order and clarification, seeking relief to preserve privilege and clarify the scope of my obligations.

Sincerely,

Amanda

Amanda Fox Perry
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From: Morry Hutton <mhutton@deborahgordonlaw.com>

Sent: Monday, July 21, 2025 5:13 PM

To: Amanda Fox <amanda@foxmckenna.com>

Cc: Deborah Gordon <dgordon@deborahgordonlaw.com>; Dora Koski <dkoski@deborahgordonlaw.com>; Teresa D'Costa <teresa@deborahgordonlaw.com>

Subject: Deficiency Letter re: McKenna v. Riley et al subpoena

Ms. Fox Perry,

Please find the attached correspondence from our office regarding your subpoena response in the above stated matter.

Please respond as requested herein by EOD Friday.

Morry Hutton

Morry Hutton | Attorney & Counselor |
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